

PHILLIP A. TALBERT
United States Attorney
DAVID W. SPENCER
EMILY G. SAUVAGEAU
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSALVA ANGULO CASTILLO,
ADAN GARCIA CASTILLO,

Defendants.

CASE NO. 2:24-CR-0020-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: September 12, 2024
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on September 12, 2024.
2. By this stipulation, defendants now move to continue the status conference until December 19, 2024, at 9:30 a.m., and to exclude time between September 12, 2024, and December 19, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes at least 4,908 pages of investigative reports, photographs, search warrants, and other evidence, as well as audio and video recordings and other materials. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendants desire additional time to review this discovery, to consult with their clients regarding potential responses to the charges, to conduct factual investigation and legal research, and to otherwise prepare for trial.

c) In addition, counsel of record for defendant Angulo Castillo, Jennifer Mouzis, began a four-week state court murder trial on September 3, 2024.

d) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of September 12, 2024 to December 19, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 5, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

1 Dated: September 5, 2024

/s/ JENNIFER MOUZIS
JENNIFER MOUZIS
Counsel for Defendant
Rosalva Angulo Castillo

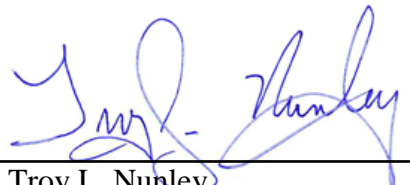
4 Dated: September 5, 2024

/s/ DANICA MAZENKO
DANICA MAZENKO
Counsel for Defendant
Adan Garcia Castillo

8 **ORDER**

9 IT IS SO FOUND AND ORDERED this 5th day of September, 2024.

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Troy L. Nunley
United States District Judge